Mr. Jim Robertson
Daimler Chrysler Corporation
1817 "I" Avenue
New Castle, IN 47362

Re: 065-12797
First Administrative Amendment to
FESOP 065-5619-00001

Dear Mr. Robertson:

Daimler Chrysler Corporation was issued a permit on December 11, 1996 for an automotive parts manufacturing operation. A letter requesting a revision to the emission limitation in Condition D.2.2 to change the units from tons per month to pounds per hour, was received on October 2, 2000. This change is necessary to verify compliance through stack testing. In addition, the source also requests that the testing requirement language be revised to reflect the current language for PM and PM_{10}. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

1. Section A.2(e), Emission Units and Pollution Control Summary, is revised to reflect that shotblaster designated as N-22 is exhausting through a stack and not internally. The revision is as follows (changes are bolded and crossed out for emphasis):

A.2 Emission Units and Pollution Control Summary
The stationary source consists of the following emission units and pollution control devices:

a) One (1) natural gas-fired boiler, rated at 250 million British thermal units per hour, identified as B-6, exhausting through Stack 205, with #2 fuel oil as backup.

b) One (1) natural gas-fired boiler, rated at 31.4 million British thermal units per hour, identified as B-9, exhausting through Stack 218, with #2 fuel oil as backup.

c) Two (2) natural gas-fired boilers, each rated at 8.37 million British thermal units per hour, identified as B-10 and B-11, exhausting through one (1) stack, each, with #2 fuel oil as backup.

d) One (1) shot blasting operation, capacity: 3,000 pounds per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.

e) One (1) shot blaster, capacity: 2,250 pounds per hour, identified as N-22, equipped with a baghouse, exhausting ~~internally into the building~~ **to a stack designated as Stack 22.**

f) Two (2) tool sharpening areas, capacity: 94 pounds per hour, each, identified as N-20 and N-21, equipped with two rotoclones, exhausting through Stacks 31 and 32.

g) One (1) maintenance paint booth, equipped with dry filters for PM control, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.

h) One (1) piston pin packer, consisting of four (4) substations, capacity: 2 ,500 parts per hour, identified as N-31, exhausting through Stack 20.

i) One (1) parts washer, capacity: 0.2 gallons per hour, identified as N-32, exhausting through Stack 6.

j) Three (3) natural gas fired boilers, each rated at 36 million British thermal units per hour, identified as #8, #9, and #10, with #2 fuel oil as backup.

2. Section D.2, Facility Description, is revised to reflect that shotblaster designated as N-22 is exhausting through a stack and not internally. The revision is as follows (changes are bolded and crossed out for emphasis):

One (1) shot blasting operation, capacity: 3,000 pounds per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.

One (1) shot blaster, capacity: 2,250 pounds per hour, identified as N-22, equipped with a baghouse, exhausting ~~internally into the building~~ **to a stack designated as Stack 22.**

3. Condition D.2.2, PM_{10}, is revised to reflect the correct emission rate limit. Currently, this source has a total PM_{10} limit established in tons per month for both shotblasters. In order to verify compliance through a stack test which is required under Condition D.2.3, the emission rate limit needs to be in pounds per hour and also each unit must have its own emission rate limit. This change does not relax the current tons per month emission limit because the new emission rate is equivalent to such value when converted to pounds per hour (e.g. 2.48 tons per month = 6.66 pounds per hour). In addition, this change does not reduce the frequency of monitoring or reporting. This revision is considered a revision to descriptive information only. The revision is as follows (changes are crossed out and bolded for emphasis):

D.2.2 PM_{10}

(a) PM_{10} emissions from the ~~two (2)~~ shot blaster~~s~~ **designated as N-3** shall not exceed ~~2.48 tons per month~~ **3.81 pounds per hour**. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) **PM_{10} emissions from the shot blaster designated as N-22 shall not exceed 2.85 pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.**

4. Condition D.2.3, Particulate Matter, is revised to reflect the current testing requirement language. This revised language is not a relaxation to the current testing requirements, but is more detailed as to the method of testing required under 40 CFR Part 60. This change is considered a revision to descriptive information only. The revision is as follows (changes are crossed out and bolded for emphasis):

D.2.3 Particulate Matter

~~The Permittee shall conduct stack testing for PM and PM_{10} (filterable and condensible) from the shot blasting operation and baghouses utilizing methods acceptable to the Commissioner. The initial test shall be used to establish a ratio between PM and PM_{10} and future tests shall be for PM_{10} only. Unless the two (2) particulate fractions are such that PM = PM_{10} then a test for PM only shall be considered acceptable for future compliance demonstrations.~~ **The Permittee shall perform PM and PM-10 testing of the shot blasting units (stacks designated as Stack 500 and Stack 22) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner.** This test shall be completed within 24 to 36 months of permit issuance and ~~shall be repeated no less than once every five years from the issuance of this permit~~ **shall be repeated at least once every five (5) years from the date of this valid compliance demonstration**. **PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
NLJ
cc: File - Henry County
U.S. EPA, Region V
Henry County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

DaimlerChrysler Corporation - New Castle Machining & Forge Plant
1817 "I" Avenue
New Castle, Indiana 47362

DaimlerChrysler Corporation - New Castle Machining & Forge Plant is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 065-5619-00001	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 11, 1996
Significant Permit Revision No.: F 065-11005	Revised Pages: Pages 4, 22, 23, 24 and 24a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 7, 1999
First Administrative Amendment No.: F 065-12797	Revised Pages: 4 and 25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTON A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates an automotive parts manufacturing source.

Responsible Official:	Jim Robertson, Plant Manager
Source Address:	1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address:	1817 "I" Avenue, New Castle, Indiana 47362
SIC Code:	3714
County Location:	Henry
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

a) One (1) natural gas-fired boiler, rated at 250 million British thermal units per hour, identified as B-6, exhausting through Stack 205, with #2 fuel oil as backup.

b) One (1) natural gas-fired boiler, rated at 31.4 million British thermal units per hour, identified as B-9, exhausting through Stack 218, with #2 fuel oil as backup.

c) Two (2) natural gas-fired boilers, each rated at 8.37 million British thermal units per hour, identified as B-10 and B-11, exhausting through one (1) stack, each, with #2 fuel oil as backup.

d) One (1) shot blasting operation, capacity: 3,000 pounds per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.

e) One (1) shot blaster, capacity: 2,250 pounds per hour, identified as N-22, equipped with a baghouse, exhausting to a stack designated as Stack 22.

f) Two (2) tool sharpening areas, capacity: 94 pounds per hour, each, identified as N-20 and N-21, equipped with two rotoclones, exhausting through Stacks 31 and 32.

g) One (1) maintenance paint booth, equipped with dry filters for PM control, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.

h) One (1) piston pin packer, consisting of four (4) substations, capacity: 2 ,500 parts per hour, identified as N-31, exhausting through Stack 20.

i) One (1) parts washer, capacity: 0.2 gallons per hour, identified as N-32, exhausting through Stack 6.

(j) Three (3) natural gas fired boilers, each rated at 36 million British thermal units per hour, identified as #8, #9, and #10, with #2 fuel oil as backup.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) shot blasting operation, capacity: 3,000 pounds per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.

One (1) shot blaster, capacity: 2,250 pounds per hour, identified as N-22, equipped with a baghouse, exhausting to a stack designated as Stack 22.

Emissions Limitations [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the shot blasting operations N-3 and N-22 shall not exceed 5.38 and 4.44 pounds per hour, respectively.

D.2.2 PM_{10}

(a) PM_{10} emissions from the shot blaster designated as N-3 shall not exceed 3.81 pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) PM_{10} emissions from the shot blaster designated as N-22 shall not exceed 2.85 pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

Testing Requirements [326 IAC 2-8-4(3)]

D.2.3 Particulate Matter

The Permittee shall perform PM and PM-10 testing of the shot blasting units (stacks designated as Stack 500 and Stack 22) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be completed within 24 to 36 months of permit issuance and shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.4 Daily Visible Emissions Notations

Daily visible emission notations of the N-3 shot blaster baghouse stack exhaust, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.5 Broken Bag or Failure Detection

The in the event that bag failure has been observed:

a) The affected compartments shall be shut down immediately until the units have been replaced.

b) Based upon the findings of the inspection, any additional corrective actions shall be devised within eight (8) hours of discovery and shall include a timetable for completion.